REMARKS/ARGUMENTS

The claims have not been amended beside to remedy the claim objection. Applicants assert that the Altamura reference has been misinterpreted and that Altamura and Sun Micro cannot be combined in the manner propounded because Altamura specifically teaches against such a combination. With regard to the interpretation of the prior amendment set forth in the current Office Action, applicants disagree with every interpretation regarding applicant's statements.

I. Claim Objection

Claim 14 has been objected to as depending from a cancelled claim. The typographical error has been remedied as set forth above. Applicants respectfully request reconsideration.

II. Rejections Under 35 U.S.C. 103(a)

Claims 1, and 6-8 are rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura et al (hereinafter "Altamura") in view of Sun Micro ("Star Office XML File Format Working Draft") (herinafter "Star"). Claims 10-12 and 16-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura in view of Star and further in view of Kink et al. (hereinafter "Kink"). Claim 4 is rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura in view of Star and further in view of Eisenberg (hereinafter "Eisenberg"). Claim 9 is rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura and Star and further in view of Pavlov. Claims 11 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Altamura, Kink, Star and further in view of U.S. Patent No. 6,725,426 issued to Pavlov (hereinafter "Pavlov").

Applicants respectfully disagree with the rejections. Independent claim 1 includes the following combination of features that is not taught or otherwise suggested by the cited references:

> determining properties corresponding to a mini-document that relates to at least one section of an application document, ***wherein the mini-document includes at least one member of a group comprising: a header and a footer***;

mapping the properties of the mini-document into a markup language element, ***wherein mapping the properties includes mapping a type attribute that corresponds to an occurrence pattern of the mini-document within the application document***, wherein mapping includes mapping the properties into a ***context free chunk*** ; and

storing the properties of the mini-document in the markup language document.

The Office Action cites to P8-1 and P9-3 of Altamura as teaching "mapping the properties of the additional mini-document into a markup language element, an attribute and a value." *Office Action* at pg. 6. The Office Action states that Altamura also teaches "storing the properties of the mini-document in the markup language document." *Office Action* at pg. 6. The Office Action continues by stating that Sun Micro teaches "wherein mapping includes mapping the properties into at least one member of a group comprising: a table element." *Office Action* at pg. 6. From this, the Office Action concludes that "[i]t would have been obvious to one of ordinary skill in the art at the time of the invention to have modified Altamura et al's method for determining properties corresponding to an additional mini-document to have further included determining the properties comprise at least one of a table element, as taught by Sun Micro. The combination of Altamura et al and Sun Micro would have allowed Altamura et al. to have implemented an 'open standard for office documents'." *Office Action* at pg. 6.

Such a combination would be contrary to the teaching of Altamura. Altamura teaches as follows:

> In WISDOM++ the elements have no attributes, since the information on font size, font weight, and so on is reported in a separate style sheet file (.css). It is also noteworthy that the DTD generated by WISDOM++ has no definition of elements, since our main goal is not to represent the layout structure explicitly, but to render the document similar in appearance to the original document, which can be achieved by means of XSL specifications, as explained later. In this way files to be transmitted through the Web are generally smaller, since they do not contain information on the hundreds of components in the document layout structure. Altamura, at pgs 8-9.

Altamura teaches in this manner because Altamura is concerned with transforming a physical document into a commercial OCR and then WISDOM++ transforms the OCR into an XML format. Altamura teaches directly away from the assertions in the Office Action.

Furthermore, the proposed combination of the attributes and definitions of Sun Micro to the teachings of Altamura are directly contrary to the teachings in Altamura because Altamura teaches that "elements have no attributes" and there is "no definition of elements". Accordingly, the rejection of claim 1 requires reconsideration and applicants respectfully request the same.

Independent claim 10 includes the following combination of features that is not taught or otherwise suggested by the cited references:

> determining properties relating to a mini-document used within a word-processing document;
>
> determining whether the mini-document is ***at least one member of a group comprising: a header and a footer***;
>
> writing the properties into a markup language element, ***wherein writing the properties includes mapping a type attribute that corresponds to an occurrence pattern of the mini-document within the word-processing document***, wherein writing includes writing the properties into ***a context free chunk element***; and
>
> storing the properties in the markup language document such that the headers and footers of the word-processing document are substantially maintained when the markup language document is parsed by an application.

For similar reasons set forth above, Altamura does not teach as propounded and the proposed combination is unwarranted. Accordingly, applicants believe that claim 10 is in condition for allowance.

Independent claim 18 has been amended to include the following combination of features that is not taught or otherwise suggested by the cited references:

> a processor; and
>
> a memory associated with computer-executable instructions configured to:
>
> determine properties relating to a mini-document included in at least one section of an application document;
>
> determine whether the mini-document is ***at least one member of a group comprising: a header and a footer***;
>
> map the properties into a markup language element, ***wherein mapping the properties includes mapping a type attribute that corresponds to an occurrence***

pattern of the mini-document within the application document, wherein mapping includes mapping the properties into ***a context free chunk element***; and

store the properties in the markup language document; and

a validation engine configured to validate the markup language document.

For similar reasons set forth above, Altamura does not teach as propounded and the proposed combination is unwarranted. Accordingly, applicants believe that claim 18 is in condition for allowance.

With regard to the dependent claims, the dependent claims include features that are not taught or suggested by the cited references. Furthermore, the dependent claims ultimately depend from the independent claims above. As such, they are thought allowable for at least the same reasons set forth above.

III. Request for Reconsideration

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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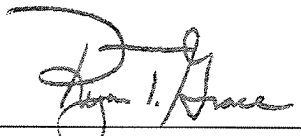

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